

Implementing ITAR/EAR Compliance in a NASA Project Environment

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As NASA continues to implement geographically and internationally diverse project teams, the necessity of controlling access to shared information causes increasing concern among team members and requires strict implementation of processes and procedures. The complexity of sharing information among such project teams when partners are not collocated has created a need to obtain and validate credentials. In addition, NASA's missions are increasingly lower-cost and have shorter design and development cycles, forcing cost constraints on information system implementation and maintenance.

JPL, as a Federally Funded Research and Development Center under NASA, must comply with all Federal statutes and regulations applicable to import and export control—specifically the International Traffic in Arms Regulations (ITAR), Export Administration Regulations (EAR) and the Code of Federal Regulations (CFR). Implementing ITAR and EAR compliance in a complex information system environment with stringent cost constraints dictates a simple, cost-effective implementation that is easily modifiable for a variety of projects.

NASA's Space Infrared Telescope Facility (SIRTF) project recently developed and implemented a combined ITAR/EAR-compliant access request and project personnel database at its JPL-based project office. SIRTF's implementation of a web-interface to the database provides access requests, access approval, user account creation, and a project telephone list. NASA's Galaxy Evolution Explorer (GALEX), a low-cost MIDEX mission adapted SIRTF's prototype at virtually no cost, proving the portability of the SIRTF solution.

This paper describes the approach used in designing the SIRTF prototype, describes the difficulties encountered, and explains the adaptability of the database to varying levels project complexity.